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Attorney for Plaintiff

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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

XIAOHUA LING,

Plaintiff,

v.

JANET NAPOLITANO, Secretary, Department of
Homeland Security; ALEJANDRO MAYORKAS,
Director, U.S. Citizenship and Immigration Services,

Defendants.

No. 5:11-cv-1704 (PSG)

**SECOND STIPULATION TO
EXTEND DATES; AND
XXXXXXXXXXXXX] ORDER**

Plaintiff, by and through his attorney of record, and Defendants, by and through their
attorneys of record, hereby stipulate, subject to the approval of the Court, to the following:

1. Plaintiff served this action on or about April 7, 2011. After a previous stipulation to
extend dates was granted, Defendants' response is due on July 6, 2011.

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2. The parties believe this matter might resolve without further litigation. The parties have agreed that a 60-day extension of time will allow Plaintiff to respond to the Notice sent by Defendants on June 17, 2011 and perhaps apply for a waiver within the 33-day time frame set forth by the Notice, and for Defendants to consider Plaintiff's response and potential waiver before issuing its decision.

3. Therefore, the parties hereby respectfully ask this Court to a 60-day extension of time within which the Defendants must serve its response in the above-entitled action. As September 4, 2011 falls on a Sunday, Defendants will file their response on or before September 5, 2011.

Dated: July 1, 2011

Respectfully submitted,

TONY WEST
Assistant Attorney General

DAVID J. KLINE
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/s/ Samuel P. Go
SAMUEL P. GO
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U.S. Department of Justice, Civil Division

Attorneys for Defendants

Date: July 1, 2011

/s/ Justin X. Wang (with permission)
JUSTIN X. WANG

Attorney for Plaintiff

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: July 5, 2011

Paul S. Grewal
PAUL SINGH GREWAL
United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Second Stipulation to Extend Dates and [Proposed] Order was served via the district court's electronic filing system on this 1st day of July 2011 to the following counsel:

JUSTIN X. WANG
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/s/ Samuel P. Go
SAMUEL P. GO
U.S. DEPARTMENT OF JUSTICE